

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Marie F. Shamberger
Cecil L. Shamberger

Debtors

Nationstar Mortgage LLC d/b/a Champion
Mortgage Company

Movant

vs.

Marie F. Shamberger
Cecil L. Shamberger

Debtors

Scott F. Waterman, Esquire

Trustee

CHAPTER 13

NO. 19-11655 AMC

11 U.S.C. Section 362

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Movant on the Debtor's residence is **\$2,676.53** which breaks down as follows:

2020 City Taxes paid on July 26, 2021 in the amount of \$271.96
2021 City Taxes paid on July 26, 2021 in the amount of \$1,366.57
Fees & Costs Relating to Motion: \$1,038.00
Total Post-Petition Arrears \$2,676.53

2. The Debtor shall cure said arrearages in the following manner:

a). Within seven (7) days of the filing of this Stipulation, Debtor shall file an Amended Chapter 13 Plan to include the post-petition arrears of **\$2,676.53**.

b). Movant shall file an Amended or Supplemental Proof of Claim to include the post-petition arrears of **\$2,676.53** along with the pre-petition arrears;

c). The new 410A form for a Proof of Claim shall not be required for this Amended or Supplemental Proof of Claim.

3. Ongoing, Debtor shall be responsible for maintaining and paying all real property taxes and hazard insurance on the property as required by the Note and Mortgage, and upon request, providing secured creditor with proof of payment of real property taxes and valid hazard insurance for the property with secured creditor identified as a loss payee.

4. In the event the payments or proofs under Sections 2 and 3 above are not tendered pursuant to the terms of this stipulation, Movant shall notify Debtor and Debtor's attorney of the default in writing and the Debtor may cure said default within FIFTEEN (15) days of the date of said notice. If Debtor should fail to cure the default within fifteen (15) days, Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant immediate relief from the automatic stay and waiving the stay provided by Bankruptcy Rule 4001(a)(3).

5. If the case is converted to Chapter 7, Movant may file a Certification of Default with the Court and the Court shall enter an order granting Movant relief from the automatic stay.

6. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

7. The provisions of this stipulation do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.

8. The parties agree that a facsimile signature shall be considered an original signature.

Date: November 8, 2021

By: /s/ Rebecca A. Solarz, Esquire
Attorney for Movant

Date: 11/23/2021

Sharon S Masters
_ Sharon S. Masters, Esquire
Attorney for Debtors

Date: November 29, 2021

/s/ Ann E. Swartz, Esquire, for

Scott F. Waterman, Esquire
Chapter 13 Trustee

Approved by the Court this _____ day of _____, 2021. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Ashely M. Chan